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Attorneys for Defendants Wells Fargo Bank, N.A. and Katherine Darrall

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANDREW D. ZARON, solely in his capacity as the Court-Appointed Receiver of JAMA INVESTMENT GROUP, INC., MAURICIO JASSO, GUILLERMO SESMA, SYLVIA MARTINEZ SALINAS, BELISARIO JASSO BALDINI, JAVIER RAMIREZ LARES, ANTONIO BACHALANI, RODRIGO FERNANDEZ, JUAN ROMERO and BERNARDO VILLACECIAS,

Plaintiffs

V.

WELLS FARGO BANK, N.A., KATHERINE
DARRALL, and JOSE RICO,

Defendants

Case No. 2:20-cv-00858-CDS-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
JOINT MOTION TO SEAL, ALL
EXHIBITS TO PLAINTIFFS'
DISPOSITIVE MOTION BRIEFING,
UNDER SEAL PORTIONS OF
PARTIES' SUMMARY JUDGMENT
BRIEFING AND JOINDERS BY ONE
DAY**

[SECOND REQUEST]

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1, Plaintiffs and Defendants, for good cause, hereby stipulate and agree to extend the deadline for the Parties to refile the under seal portions of their summary judgment briefs, Plaintiffs' exhibits to their dispositive motion briefing (as directed by the Court (*see* ECF 457)),¹ and the parties' Joint Motion to Seal ("Joint Motion"), and the exhibits thereto, and previously filed joinders from January 24, 2024 to

¹ All of the public versions of the Parties' respective summary judgment motions, responses, and replies, as well as the Defendants' exhibits, will be filed by the January 24, 2024 deadline.

1 January 25 2024, and state as follows:

2 1. On December 18, 2023, the Court held a hearing, during which the Court directed
3 the parties to re-file their summary judgment motions (without substantive changes) and exhibits
4 thereto, together with a new motion to seal and redact pertinent materials, by January 17, 2024. *See*
5 ECF 457.

6 2. The Court's Minute Entry states, "If parties need additional time, they may file a
7 stipulation for additional time." *See* ECF 457.

8 3. The Court once extended the deadline by one week, to January 24, 2024. *See* ECF
9 459 (granting Stipulation at ECF 458).

10 4. The Parties have been working diligently to file their papers by January 24, 2024,
11 and the Parties plan to have their public version of the briefings filed.. This process took substantial
12 time due to the number of documents and issues involved, as well as the Parties in good faith
13 adapting their positions during the meet-and-confer process, which ultimately has resulted in much
14 more of the materials at issue being filed in the public record (some of which was resolved as
15 recently as today)and minimizing the material proposed to be sealed. Moreover, as filings were
16 being finalized, there was some miscommunication as to which party was filing which documents
17 because the parties have agreed to submit a joint motion to file certain documents under seal, as
18 well as the chronological order of document filing, which has unfortunately made it impracticable
19 for the exhibits to Plaintiffs' filings and the sealed and redacted exhibits to the Joint Motion to be
20 submitted by the January 24, 2024 deadline.

21 5. The Parties submit this request is not for the purpose of delay and that it is consistent
22 with the purposes stated in Rule 1, Federal Rules of Civil Procedure.

23 6. In light of the above, the Parties respectfully stipulate and request that the deadline
24 to file the under seal portions of their summary judgment briefs and the briefs' exhibits (as directed
25 by the Court (*see* ECF 457)), all exhibits to Plaintiffs' dispositive motions briefing and the parties'
26 Joint Motion to Seal, the exhibits thereto, and previously filed joinders be extended from January
27 24, 2024 to January 25, 2024.

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1 DATED this 24th day of January, 2024.

2 SNELL & WILMER L.L.P.

3 /s/ Jacob C. Jones

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10 *Attorneys for Defendants Wells Fargo Bank,
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12 DATED this 24th day of January, 2024

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14 /s/ Colleen E. McCarty (with permission)

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23 DATED this 24th day of January, 2024.

24 KELLEY UUSTAL, PLC

25 /s/Courtney Caprio (with permission)

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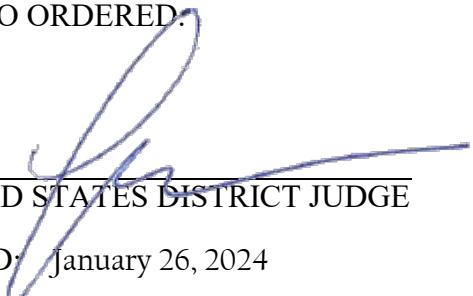
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44 IT IS SO ORDERED.

45 
46 UNITED STATES DISTRICT JUDGE

47 DATED: January 26, 2024